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March 9, 2017

VIA ECF

Hon. Debra Freeman, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: Walter Noel, IV, on behalf of himself and
similarly situated individuals v. Laidlaw
& Company, Ltd.
Case No.: 16-CV-03975 (RMB) (DCF)**

Dear Judge Freeman:

This firm represents Defendant Laidlaw & Company (UK), Ltd. (“Defendant”) in connection with the above-referenced matter. In accordance with the January 11, 2017 order, we write on behalf of the parties to jointly provide the Court with a status update, and to further request a stay of discovery pending mediation.


As you may recall, the parties stipulated to dissemination of notice pursuant to 29 U.S.C. § 216(b), which a third-party distributed on November 28, 2016. In light of the then-pending notice period, the parties wrote to the Court on December 30, 2016 to request an extension of discovery. On January 11, 2017, the Court granted the parties’ joint request for a 60-day extension of discovery through February 28, 2017, and the Court further ordered the parties to provide a status update by March 9, 2017. On January 27, 2017, the 60-day notice period expired and 17 opt-in plaintiffs returned consent forms, which have since been filed with the Court.

Currently, the parties are scheduled to participate in mediation before Martin Scheinman on April 12, 2017. Since the parties have not participated in mediation yet, we respectfully request a stay of discovery pending mediation. This is the parties’ first request for a stay of discovery. If granted, this request would adjourn the status conference currently scheduled for March 16, 2017.

Thank you for your attention to this matter. We are available at the Court's convenience should you require any additional information.

Respectfully submitted,

JACKSON LEWIS P.C.



Wendy J. Mellk

cc: Walker G. Harman, Jr.
Edgar M. Rivera
Tania J. Mistretta